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**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

MIKE LAFFEN, an Individual, On Behalf of)
Himself and All Others Similarly Situated,)

Plaintiff,)

v.)

HEWLETT-PACKARD COMPANY, PLAN)
COMMITTEE, INVESTMENT REVIEW)
COMMITTEE and JOHN DOE)
"FIDUCIARIES" 1-50,)

Defendants,)

and)

HEWLETT-PACKARD COMPANY 401(K))
PLAN,)

Nominal Defendant.)
_____)

Case No. C-12-06199 CRB

**JOINT STIPULATION AND
[PROPOSED] ORDER
CONSOLIDATING RELATED ERISA
ACTIONS AND FOR HEARING ON
UNOPPOSED MOTION FOR
APPOINTMENT OF INTERIM
EXECUTIVE COMMITTEE AND CO-
LEAD AND INTERIM CLASS
COUNSEL**

CLASS ACTION

JOINT STIP AND [PROPOSED] ORDER CONSOLIDATING RELATED ERISA ACTIONS AND
HRG ON APPOINTMNT AN INTERIM EXEC COMMITTEE AND INTERIM CO-LEAD COUNSEL
C-12-06199 CRB, C-12-06410 CRB & C-13-0301 CRB

KARYN LUSTIG, Derivatively On Behalf Of
The Hewlett-Packard Company 401(k) Plan,

Plaintiff,

vs.

MARGARET C. WHITMAN, MARC L.
ANDREESSEN, SHUMEET BANERJI, RAJIV
L. GUPTA, JOHN H. HAMMERGREN,
RAYMOND J. LANE, ANN M. LIVERMORE,
GARY M. REINER, PATRICIA F. RUSSO, G.
KENNEDIY THOMPSON, RALPH V.
WHITWORTH, HEWLETT-PACKARD
COMPANY, THE PLAN COMMITTEE, and
THE INVESTMENT REVIEW COMMITTEE,

Defendants.

Case No: C-12-06410 CRB

CLASS ACTION

KENNETH A. KOTYUK, Derivatively On
Behalf Of The Hewlett-Packard Company
401(k) Plan,

Plaintiff,

vs.

HEWLETT-PACKARD COMPANY, THE
PLAN COMMITTEE, and "JOHN DOE"
FIDUCIARIES 1-50,

Defendants.

Case No: C-13-00301 CRB

CLASS ACTION

1 WHEREAS, the following three actions are now pending in the Northern District of
2 California (collectively the “HP ERISA Actions”):

3 *Mike Laffen v. Hewlett-Packard Company* (“*Laffen*”), Case No. C-12-06199 CRB

4 *Karyn Lustig v. Whitman* (“*Lustig*”), Case No. C-12-06410-CRB

5 *Kenneth A. Kotyuk v. Hewlett-Packard Company* (“*Kotyuk*”), Case No. C-13-00301
6 CRB

7 WHEREAS, two of the three HP ERISA Actions assert ERISA claims ostensibly on
8 behalf of similarly situated participants in and beneficiaries of Hewlett-Packard Company’s
9 (“HP” or the “Company”) 401(k) Plan (the “HP Plan”), against the Company, the Plan
10 Committee, the Investment Review Committee, and Doe Fiduciaries under the HP Plan whose
11 identities are not known, for their alleged breaches of fiduciary duties under ERISA § 404(a), 29
12 U.S.C. § 1104(a) and ERISA § 405(a), 29 U.S.C. § 1105, and one asserts similar claims against
13 those defendants and individual officers and directors of HP;

14 WHEREAS, the Court determined by order entered January 3, 2013 in the earlier-filed
15 action entitled *Nicolow v. Hewlett-Packard Co.*, Case No. C-12-05980-CRB, that the *Laffen* and
16 *Lustig* ERISA Actions, seven HP Derivative Actions are related pursuant to Local Rule 3-12(a),
17 and all have been assigned to the Honorable Charles R. Breyer;¹

18 WHEREAS, the *Kotyuk* ERISA Action was later related and assigned to the Honorable
19 Charles R. Breyer by Order dated February 8, 2013;

20 WHEREAS, the HP ERISA Actions above all allege the same transactions and
21 occurrences and involve the same or substantially similar issues of law and facts within the
22 meaning of Fed. R. Civ. P. 42(a) for purposes of consolidation;

23 ¹ The Court’s January 3, 2013 Order determined that ten pending actions are related to the earliest-
24 filed case, which is a putative securities class action captioned *Nicolow v. Hewlett-Packard Co.*, Case
25 No. C-12-05980-CRB (“*Nicolow*”). The pending actions related to *Nicolow* consist of (i) the seven HP
26 Derivative Actions consolidated by Court Order on February 21, 2013 (“*Hewlett-Packard Company*
27 *Shareholder Derivative Litigation*”); (ii) a putative securities class action captioned *Pokoik v. Hewlett-*
28 *Packard Co.*, Case No. C-12-06074- CRB (“*Pokoik*”); and (iii) the *Laffen* and *Lustig* ERISA actions. The
Nicolow, *Pokoik*, and *Hewlett-Packard Company Shareholder Derivative Litigation* cases are not subject
to this Stipulation.

1 WHEREAS, counsel for plaintiffs in all of the HP ERISA Actions have conferred as to
2 the appointment of co-lead and interim class counsel and liaison counsel, the plaintiffs hereby
3 consent to the appointment of an interim executive committee consisting of Wolf Haldenstein
4 Adler Freeman & Herz LLP (“Wolf Haldenstein”), Zamansky & Associates LLP (“Zamansky”),
5 Gainey McKenna & Egleston and Harwood Feffer LLP (collectively the “Interim Executive
6 Committee”), with Wolf Haldenstein and Zamansky serving as Co-Lead and Interim Class
7 Counsel for plaintiffs and the proposed class and Betsy Manifold of Wolf Haldenstein serving as
8 Liaison Counsel;

9 WHEREAS, counsel for plaintiffs in HP ERISA Actions have met and conferred and
10 have agreed that the pending unopposed motion for appointment of co-lead and interim class
11 counsel, liaison counsel pursuant to Fed. R. Civ. P. 23(g)(3) in the *Laffen* case should be heard as
12 scheduled on March 1, 2013 and should be for the appointment of co-lead and interim class
13 counsel in all three HP ERISA Actions;

14 WHEREAS, counsel for plaintiffs, nominal defendant HP Plan and the undersigned
15 defendants have met and conferred and defendants take no position respecting the propriety of
16 plaintiffs’ counsel for appointment as co-lead and interim class counsel, liaison counsel and an
17 executive committee, as requested by plaintiffs, but wish the Court to identify which counsel has
18 authority to act on behalf of plaintiffs and the putative class and for that reason do not oppose the
19 motion for appointment of co-lead and interim class counsel on behalf of all three HP ERISA
20 Actions;

21 WHEREAS, defendants do not waive their right to contest the suitability of HP ERISA
22 Actions to move forward as a class action under Fed. R. Civ. P. 23(a) and (b), whether on an
23 individual or consolidated basis;

24 WHEREAS, counsel for plaintiffs, nominal Defendant HP Plan and the undersigned
25 defendants agree that the ADR and Rule 26 deadlines set in the respective HP ERISA Actions
26 should be re-noticed and set based on the initial case management date to be set by the Court
27 upon consolidation of the HP ERISA Actions;

28
JOINT STIP AND [PROPOSED] ORDER CONSOLIDATING RELATED ERISA ACTIONS AND
HRG APPOINTING AN INTERIM EXEC COMMITTEE AND INTERIM CO-LEAD COUNSEL
C-12-06199 CRB, C-12-06410 CRB & C-13-0301 CRB

WHEREAS, counsel for plaintiffs, nominal defendant HP Plan and the undersigned defendants have reviewed the Stipulation so ordered by the Court on February 4, 2013 in the *Laffen* action (“February 4, 2013 Order”) and have agreed that no answers, motions or other responses to the complaints currently on file in any of the HP ERISA Actions need to be filed and have agreed to the same schedule for filing a consolidated complaint as set forth in the February 4, 2013 Order;

WHEREAS, counsel for plaintiffs, nominal defendant HP Plan and the undersigned defendants have met and conferred and have agreed to the schedule in the February 4, 2013 Order for responding to the consolidated complaint unless otherwise ordered by Court on its own initiative or pursuant to motion or stipulation;

WHEREAS, the agreed-upon schedule is not for the purpose of delay, promotes efficient case management, judicial efficiency and will not cause prejudice to any party;

WHEREAS, THEREFORE, IT IS HEREBY STIPULATED AND AGREED by the parties through their respective counsel of record, subject to the approval of the Court, as follows:

I. CONSOLIDATION OF ACTIONS

1. Under Fed. R. Civ. P. 42(a), the following cases are consolidated for all purposes, including discovery, pretrial proceedings and trial:

Abbreviated Case Name	Case Number	Date Filed
<i>Laffen v. HP Co., et al.</i>	C-12-06199 CRB	December 6, 2012
<i>Lustig v. Whitman, et al.</i>	C-12-06410 CRB	December 18, 2012
<i>Kotyuk v. HP Co., et al.</i>	C-13-0301 CRB	January 22, 2013

2. The caption of these consolidated actions shall be “*In re HP ERISA Litigation*” and the files of these consolidated actions shall be maintained in one file under Master File No. C-12-06199-CRB. Any other ERISA actions now pending, later filed in, or transferred to this Court which arise out of questions of law or fact similar to those alleged in the above-identified cases shall be consolidated for all purposes, if and when they are brought to the Court’s

JOINT STIP AND [PROPOSED] ORDER CONSOLIDATING RELATED ERISA ACTIONS AND
HRG APPOINTING AN INTERIM EXEC COMMITTEE AND INTERIM CO-LEAD COUNSEL
C-12-06199 CRB, C-12-06410 CRB & C-13-0301 CRB

1 attention.

2 3. Every pleading filed in the consolidated actions, or in any separate action
3 included herein, shall bear the following caption (“Consolidated Action”):

4
5 IN RE HP ERISA LITIGATION

Master File No. C 12-06199-CRB

6
7 **II. PENDING, SUBSEQUENTLY FILED, AND TRANSFERRED RELATED**
8 **ACTIONS**

9 4. Each and every putative action pending, subsequently filed in, transferred to, or
10 removed to this Court that involves questions of law or fact similar to those alleged in the
11 Consolidated Action and is designated a related case under Rule 3-12(a) of this Court’s Local
12 Rules of Practice in Civil Proceedings (“Related Action”) shall be governed by the terms of this
13 Order and shall be consolidated for all purposes with the Consolidated Action, and the Clerk of
14 the Court shall file a copy of this Order in the docket of the Related Action.

15 5. In the circumstances referred to above, Liaison Counsel shall promptly mail a
16 copy of this Order to counsel for the plaintiff(s) in each Related Action and for any defendant(s)
17 in the Related Action who are not already parties to the Consolidated Action.

18 6. This Order shall apply to each related case unless a party objecting to the
19 consolidation files and serves an application for relief from this Order within ten (10) days after
20 the date on which Liaison Counsel, as defined below, mails a copy of this Order to counsel for
21 that party. The provisions of this Order shall apply to the Related Action until the Court’s
22 ruling on the application. A party to a Related Action shall be entitled to relief from the terms
23 of this Order only if the party’s motion demonstrates that the Related Action does not involve
24 questions of law or fact similar to those contained in the Consolidated Action.

25 **III. ORGANIZATION OF PLAINTIFFS’ COUNSEL**

26 7. Prosecution of the Consolidated Action and each Related Action on behalf of
27 plaintiffs and the proposed class shall be managed and directed by the Co-Lead and Interim
28 Class Counsel. All specific assignments to the Executive Committee shall be performed in such

1 a manner as to lead to the orderly and efficient prosecution of the Consolidated Action and each
2 Related Action and to avoid duplicative or unproductive effort and unnecessary burdens on the
3 parties.

4 8. The Executive Committee shall consist of Wolf Haldenstein, Zamansky, Gainey
5 McKenna & Egleston and Harwood Feffer LLP.

6 9. Liaison Counsel shall be Betsy C. Manifold of Wolf Haldenstein. She shall be
7 available and responsible on behalf of plaintiffs for communications to and from this Court.
8 Liaison counsel shall be responsible for the creation and maintenance of a master service list of
9 all parties and their counsel.

10 10. Co-Lead and Interim Class Counsel in consultation with, the other members of
11 the Executive Committee, shall set policy for the prosecution of the litigation and shall be
12 responsible for coordinating the prosecution of the action by plaintiffs' counsel, and shall assign
13 any one or more of the following tasks among the members of the Executive Committee:

- 14 (a) to prepare pleadings, motions, briefs, and other papers to be served upon
15 defendants or filed with the Court;
- 16 (b) to argue issues during hearings and address the Court during conferences;
- 17 (c) to conduct formal and informal discovery, and to retain experts and
18 consultants on behalf of plaintiffs;
- 19 (d) to engage in settlement negotiations with defendants' counsel and enter
20 into settlements.

21 11. Co-Lead and Interim Class Counsel shall have authority to speak for plaintiffs in
22 matters regarding discovery, pretrial and trial procedure and settlement negotiations, and shall
23 make all work assignments on behalf of plaintiffs and the proposed class in such manner as to
24 facilitate the orderly and efficient prosecution of this litigation and to avoid duplicative or
25 unproductive effort.

26 12. Co-Lead and Interim Class Counsel shall be responsible for coordination of all
27 activities and appearances on behalf of plaintiffs and the proposed class, and for the
28 dissemination of notices and orders of this Court. No motion, request for discovery or other

1 pretrial or trial proceedings shall be initiated or filed by plaintiffs except through Co-Lead and
2 Interim Class Counsel.

3 13. Counsel in any related ERISA class action that has been or may be consolidated
4 with the Consolidated Action shall be bound by this organizational structure of plaintiffs'
5 counsel.

6 **IV. UNOPPOSED MOTION FOR APPOINTMENT OF CO-LEAD AND** 7 **INTERIM COUNSEL**

8 14. An unopposed motion for appointment of co-lead and interim class counsel
9 pursuant to Fed. R. Civ. P. 23(g)(3) was filed in the *Laffen* case on December 21, 2012 and is
10 scheduled to be heard on March 1, 2013.

11 15. Plaintiffs in the *Lustig* and *Kotyuk* consent to the appointment of the same co-lead
12 and interim class counsel in their cases and in the *In re HP ERISA Litigation*.

13 16. Defendant HP Plan and the other defendants take no position on the appointment
14 of the proposed co-lead and interim class counsel and liaison counsel in the *In re HP ERISA*
15 *Litigation* and do not oppose the motion. Defendants' right to contest the suitability of
16 certification of a class or subclasses in *In re HP ERISA Litigation* shall remain intact and
17 unaffected by this Order.

18 **V. ADA AND RULE 26 DEADLINES**

19 17. The ADR and Rule 26 deadlines in the in the respective HP ERISA Actions shall
20 be re-noticed based on the initial case management conference to be set by the Court in the
21 Consolidated Action. Nothing in this Order shall preclude the parties from the right to receive
22 relief from these deadlines or discovery by subsequent motion.

23 **VI. PARTIES ADOPT THE FEBRUARY 4, 2013 ORDER RE:SCHEDULE**

24 18. The parties named as defendants in the pending complaints in the HP ERISA
25 Actions, including HP (collectively, "Defendants"), shall not be required to answer, file
26 motions, or otherwise take any action in response to any of the complaints currently on file in
27 any of the HP ERISA Actions. The time for such Defendants' answers, motions, or other
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responses shall be determined as specified in Paragraph 20 below, following the filing of a consolidated complaint or designation of an operative complaint, or as the Court hereafter may order. In the event additional actions are subsequently consolidated into *In re HP ERISA Litigation*, the parties named as defendants in the complaints in such additional actions shall not be required to answer, file motions, or otherwise take any action in response to such complaints until the time specified in Paragraph 20 or as otherwise specified by the Court. No Defendant shall be deemed to have submitted to the jurisdiction of this Court or to have waived or otherwise relinquished any rights, arguments, or defenses of any kind by not filing an answer, motion or other response to any complaint in the consolidated action prior to the date specified in Paragraph 20 below or other order of the Court. Pursuant to Local Rule 6-1(a), this paragraph of this Stipulation shall be effective upon its filing with the Court.

19. Plaintiffs shall have until 75 (seventy-five) days from the date lead plaintiff and lead counsel are appointed in the *Nicolow* and *Pokoik* cases to file a consolidated complaint.

20. Defendants shall have 45 (forty-five) days from the date plaintiffs file their consolidated complaint to answer, move or otherwise respond to the complaint governing as of that date.

21. If defendants move to dismiss the consolidated complaint, plaintiffs shall have 45 (forty-five) days from the date of defendants' motion to file a response to that motion, and defendants shall have 30 (thirty) days from the date of plaintiffs' response to file a reply.

IT IS SO STIPULATED.

DATED: February 27, 2013

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RACHELE R. RICKERT
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/s/ Betsy C. Manifold
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JOINT STIP AND [PROPOSED] ORDER CONSOLIDATING RELATED ERISA ACTIONS AND
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JOINT STIP AND [PROPOSED] ORDER CONSOLIDATING RELATED ERISA ACTIONS AND
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DATED: February 27, 2013

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JOINT STIP AND [PROPOSED] ORDER CONSOLIDATING RELATED ERISA ACTIONS AND
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C-12-06199 CRB, C-12-06410 CRB & C-13-0301 CRB

1 DATED: February 27, 2013

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22 Attorneys for Defendants
Hewlett-Packard Company and Hewlett-Packard
Company 401(K) Plan
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JOINT STIP AND [PROPOSED] ORDER CONSOLIDATING RELATED ERISA ACTIONS AND
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C-12-06199 CRB, C-12-06410 CRB & C-13-0301 CRB

DECLARATION REGARDING CONCURRENCE

I, Betsy C. Manifold, am the ECF User whose identification and password are being used to file this JOINT STIPULATION AND [PROPOSED] ORDER CONSOLIDATING RELATED ERISA ACTIONS AND FOR HEARING ON UNOPPOSED MOTION FOR APPOINTMENT OF INTERIM EXECUTIVE COMMITTEE AND CO-LEAD AND INTERIM CLASS COUNSEL. In compliance with Local Rule 5-1(i)(3), I hereby attest that Jacob Zamansky, Gregory M. Egleston, Robert I. Harwood, Richard S. Horvath, Jr., Jeffrey M. Kaban, and Nicole A. Diller have concurred in this filing.

DATED: February 27, 2013

WOLF HALDENSTEIN ADLER FREEMAN
& HERZ LLP

By: /s/ Betsy C. Manifold
BETSY C. MANIFOLD

[PROPOSED] ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: February ____, 2013

THE HONORABLE CHARLES R. BREYER
UNITED STATES DISTRICT JUDGE

HP:19612.stip

JOINT STIP AND [PROPOSED] ORDER CONSOLIDATING RELATED ERISA ACTIONS AND
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C-12-06199 CRB, C-12-06410 CRB & C-13-0301 CRB